

June 17, 2002

Mr. Dave Beck  
York Casket Company  
2125 E. County Road 1050 South  
Lynn, IN 47355

Re: **135-15524**  
Minor Source Modification to:  
Part 70 Operating Permit No.: **T 135-7198-00009**

Dear Mr. Beck:

York Casket Company was issued Part 70 operating permit **T 135-7198-00009** on September 16, 1998 for a casket manufacturing source. An application to modify the source was received on April 17, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (e) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.
- (f) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 15 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

MSS/MES

cc: File - Randolph County  
Randolph County Health Department  
Air Compliance Section Inspector - Dave Rice  
Compliance Branch - Karen Nowak  
Administrative and Development - Lisa Lawrence  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**York Casket Company - Indiana  
US 27 and County Road 1050 South  
Lynn, Indiana 47355**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No: MSM 135-15524-00009	Conditions Affected: A.2, D.1.2 - D.1.6 Conditions Added: D.1.2, D.1.3, D.1.6, D.1.7 and D.1.11 plus Quarterly Report Forms Sections Affected D.1 and D.2
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 17, 2002

- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

**Testing Requirements [326 IAC 2-7-6(1)]**

- C.9 Performance Testing [326 IAC 3-6]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Monitoring Methods [326 IAC 3]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]  
[326 IAC 2-7-6] [326 IAC 1-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]
- C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Main Plant**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-6]  
[326 IAC 2-4.1-1] [40 CFR 52.21] [326 IAC 2-2]
- D.1.3 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7-10.5(d)(5)(E)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
- D.1.7 VOC and HAPs Emissions

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.1.8 Particulate Matter (PM)
- D.1.9 Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.1.10 Record Keeping Requirements

D.1.11 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS - Specialty Plant**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.2.1 Volatile Organic Compounds (VOC)

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

**Compliance Determination Requirements**

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.2.4 Volatile Organic Compounds (VOC)

D.2.5 Volatile Organic Compounds (VOC)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.2.6 Particulate Matter (PM)

D.2.7 Monitoring

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.2.8 Record Keeping Requirements

D.2.9 Reporting Requirements

**Certification Form**

**Quarterly Compliance Monitoring Form**

**Emergency/Deviation Occurrence Report**

**Quarterly Report Forms**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary burial casket manufacturing source.

Responsible Official: Dave Beck  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
SIC Code: 3995  
County Location: Randolph  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major under PSD Rules  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

#### Main Plant

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3C, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.

- (f) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.

**Specialty Plant**

- (g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable NSPS or NESHAP requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] - Main Plant**

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3C, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.
- (f) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2, the PM from spraying operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-6]  
[326 IAC 2-4.1-1] [326 IAC 2-2] [40 CFR 52.21]**

- (a) The potential to emit VOC from the two (2) spray booths, known as P-3C and P-4C shall be limited to less than twenty-five (25) tons twelve (12) consecutive month period, total; and
- (b) The potential to emit of an individual HAP shall be limited to less than ten (10) tons per twelve (12) consecutive month period and a combination of HAPs shall be limited to less than twenty-five (25) tons per twelve (12) consecutive, total.
- (c) Therefore, the requirements of 326 IAC 2-4.1-1, 326 IAC 8-1-6, 326 IAC 2-2 and 40 CFR 52.21 do not apply.

**D.1.3 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7-10.5(d)(5)(E)]**

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- (a) The total solids delivered to the applicators at the two (2) spray paint booths (P-3C and P-4C) shall not exceed 42.8 tons per twelve (12) consecutive month period.
- (b) Based on a minimum sixty-five percent (65%) transfer efficiency, this total solids throughput limit is equivalent to a potential to emit PM<sub>10</sub> (since PM is equal to PM<sub>10</sub>) before controls from the two (2) spray booths (P-3C and P-4C) of less than fifteen (15) tons per year.
- (c) Compliance with this throughput limit and a minimum sixty-five percent (65%) transfer efficiency renders the requirements of 326 IAC 2-7-10.5(f), 326 IAC 2-2 and 40 CFR 52.21 not applicable.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)**

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Compliance with the VOC and HAP usage limitations contained in Condition D.1.2 and shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.7 VOC and HAPs Emissions**

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Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage for the twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.8 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when spray coating is in operation.

**D.1.9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks EP-2A, EP-2H, EP-3A, EP-3B, EP-4A, EP-4B, EP-3C and EP-4C while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.2, D.1.3 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, HAPs, and PM<sub>10</sub> emission limits established in Conditions D.1.2 and D.1.3.
  - (1) The amount as well as the VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The total VOCs, HAPs and PM<sub>10</sub> emitted for each month; and
  - (4) The weight of the VOCs, HAPs and PM<sub>10</sub> emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Specialty Plant

- (g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Volatile Organic Compound

- (a) Pursuant to Operation Permit-68-01-94-0132, issued on March 12, 1990, the Specialty Plant shall use no more than 2.08 tons of VOC, including coatings, dilution solvents, and cleaning solvents per month. This usage limit makes 326 IAC 8-1-6 not applicable.
- (b) Pursuant to CP 135-4643, issued on July 27, 1995, the amount of stripper used in the stripping operation at the Specialty Plant shall be limited to 3,600 gallons per 12 consecutive month period.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

### Compliance Determination Requirements

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 or the particulate matter limit specific in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.2.5 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when spray coating is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C  
Parameter: VOC Delivered to the Applicators  
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
 Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
 Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
 Part 70 Permit No.: T 135-7198-00009  
 Facilities: Spray Booths P-3C and P-4C  
 Parameter: Single HAP Delivered to the Applicators  
 Limit: Less than ten (10) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Attach a signed certification to complete this report.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C  
Parameter: Combination of HAPs Delivered to the Applicators  
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Combination HAPs (tons)	Combination HAPs (tons)	Combination HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: York Casket Company - Indiana  
Source Address: US 27 and County Road 1050 South, Lynn, Indiana 47355  
Mailing Address: 2125 E. County Road 1050 South, Lynn, Indiana 47355  
Part 70 Permit No.: T 135-7198-00009  
Facilities: Spray Booths P-3C and P-4C  
Parameter: Coating Solids  
Limit: The total solids delivered to the applicators shall not exceed 42.8 tons per twelve (12) consecutive month period, total. This throughput limit is equivalent to PM<sub>10</sub> emissions of less than fifteen (15) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Total Solids Delivered (tons)	Total Solids Delivered (tons)	Total Solids Delivered (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

June 17, 2002

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Minor Source and Minor Permit Modifications

#### Source Background and Description

<b>Source Name:</b>	<b>York Casket Company</b>
<b>Source Location:</b>	<b>Corner of U.S. and Country Road 1050 South, Lynn, Indiana 47355</b>
<b>County:</b>	<b>Randolph County</b>
<b>SIC Code:</b>	<b>3995</b>
<b>Operation Permit No.:</b>	<b>T 135-7198-00009</b>
<b>Operation Permit Issuance Date:</b>	<b>December 16, 1998</b>
<b>Minor Source Modification No.:</b>	<b>135-15524-00009</b>
<b>Minor Permit Modification No.:</b>	<b>135-15568-00009</b>
<b>Permit Reviewer:</b>	<b>Michael S. Schaffer</b>

The Office of Air Quality (OAQ) has reviewed a modification application from York Casket Company relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.
- (b) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.

#### History

On April 17, 2002, York Casket Company submitted an application to the OAQ requesting to add additional two (2) spray booths to their existing plant. York Casket Company was issued Part 70 permit T 135-7198-00009 on December 16, 1998, First Administrative Amendment AA 135-14728-00009 on August 21, 2001, First Significant Permit Modification SPM 135-15042-00009 on January 22, 2002 and First Reopening to a Part 70 Operating Permit R 135-13463-00009 on April 2, 2002.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
EP-3C	color coat spray booth	19	2.0	9000	70
EP-4C	topcoat spray booth	27	2.0	9000	70

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### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 17, 2002.

### Emission Calculations

See pages 1 and 2 of 2 of Appendix A of this document for detailed emissions calculations.

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	31.3
PM <sub>10</sub>	31.3
SO <sub>2</sub>	-
VOC	136
CO	-
NO <sub>x</sub>	-

<b>HAPS</b>	<b>Potential To Emit (tons/year)</b>
Xylene	20.5
Toluene	0.240
Ethyl Benzene	4.20
Glycol Ethers	18.7
<b>TOTAL</b>	<b>43.7</b>

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### Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)(A) and 326 IAC 2-7-10.5(d)(5) (E). This is a minor source modification because the potential to emit will be limited to less than twenty-five (25) tons per year of any regulated pollutant, except less than fifteen (15) tons per year for PM<sub>10</sub>. Hazardous air pollutants will be limited to less than ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants. The potential to emit VOC will be limited by the total annual solvent usage and/or maximum volatile organic compound content of the materials used in the proposed booths and the potential to emit PM<sub>10</sub> will be limited by the annual raw material (solids) throughput.

The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Minor Permit Modification (MPM 135-15568-00009) in accordance with 326 IAC 2-7-12(b)(1). The Minor Permit Modification will give the source approval to operate the proposed emission units.

### County Attainment Status

The source is located in Randolph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Randolph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Randolph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours

of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM <sub>10</sub>	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two (2) hundred fifty (250) tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Part 70 Operating Permit for this source T 135-7198-00009.

**Potential to Emit of Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO <sub>x</sub> (tons/yr)
Proposed Modification	0.288	0.288	-	less than 25	-	-
Contemporaneous Increases	0.288	0.288	-	less than 25	-	-
Net Emissions	0.288	0.288	-	less than 25	-	-
PSD Significant Level	25	15	40	40	100	40

York Casket Company has elected to limit the potential to emit VOC from the two (2) new spray booths, known as P-3C and P-4C to a total of less than twenty-five (25) tons per year and the potential to emit PM<sub>10</sub> to less than fifteen (15) tons per year. York Casket Company will also limit the potential to emit a combination of HAPS to less than twenty five (25) tons per year and each individual HAP to less than ten (10) tons per year.

This modification to an existing major stationary source is not major because the limited emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

**Federal Rule Applicability**

- (a) This modification does not involve a pollutant-specific emissions unit with the potential to emit after limits and controls in an amount equal to or greater than one hundred (100) tons per year. The two (2) additional spray booths, know P-3C and P-4C are also not considered large pollutant specific emission units because the potential to emit after controls and limitations are less than one hundred percent (100%) of the amount required for a source to be classified as a major source. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification.

### **State Rule Applicability - Entire Source**

#### 326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The addition of the two (2) proposed spray booths to this existing major source is not subject to the requirements of 326 IAC 2-2 since VOC emission limits and PM<sub>10</sub> emission limits do not exceed PSD significant levels.

#### 326 IAC 2.4.1-1 (New Source Toxics Control)

The two (2) proposed additional spray booths are considered a modification to an existing coating line. The two (2) proposed additional spray booths will not be considered a reconstruction as defined by NESHAP to the existing coating line. Therefore, the requirements of 326 IAC 2.4.1-1 do not apply to the two (2) additional paint booths.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the two (2) additional spray booths, known as P-3C and P-4C shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the two (2) spray booths are in operation, in order to comply with this limit.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

The two (2) additional spray booths, known as P-3C and P-4C, are not subject to the requirements of 326 IAC 8-2-9 because pursuant to 326 IAC 8-2-9(b)(10), the application of coatings to burial caskets (Standard Industrial Classification Code 3995) in Randolph County are exempt from the requirements of 326 IAC 8-2-9.

#### 326 IAC 8-1-6 (New facilities; General Reduction Requirements)

The potential to emit VOC from the two (2) additional spray booths, known as P-3C and P-4C shall be limited to less than 22.7 megagrams (25 tons) per year. Therefore, the reduction requirements using best available control technology (BACT) pursuant to 326 IAC 8-1-6 do not apply.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The two (2) additional proposed spray booths, known as P-3C and P-4C has applicable compliance monitoring conditions as specified below: list conditions

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for P-3C and P-4C. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the spray booths is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the spray booths stack exhausts, known as Stacks EP-3C and EP-4C, for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters to control overspray must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

### Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

#### Main Plant

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3GD, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) **One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.**
- (f) **One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.**

Specialty Plant

- (e)(g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] - Main Plant**

- (a) One (1) primer paint spray booth and one (1) bottom primer spray booth, known as P-2A and P-2H, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-2A and EP-2H, capacity: 27 burial caskets per hour, total.
- (b) Two (2) color coat spray booths (#1 and #2) known as P-3A and P-3B, each equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stacks EP-3A and EP-3B, capacity 27 burial caskets per hour, total.
- (c) One (1) paint stripper dipping operation, known as P-3C, exhausting through stack EP-3C, capacity: 27 burial caskets per hour.
- (d) Two (2) topcoat spray booths (#1 and #2), known as P-4A and P-4B, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack EP-4A and EP-4B, capacity: 27 burial caskets per hour, total.
- (e) One (1) color coat spray booth, known as P-3C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-3C, capacity: 14 burial caskets per hour.**
- (f) One (1) topcoat spray booth, known as P-4C, equipped with electrostatic spray guns and dry filters to control overspray, to be located in Main Plant operations, exhausting through stack EP-4C, capacity: 14 burial caskets per hour.**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from spraying operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-6] [326 IAC 2-4.1-1] [326 IAC 2-2] [40 CFR 52.21]

- (a) The potential to emit VOC from the two (2) spray booths, known as P-3C and P-4C shall be limited to less than twenty-five (25) tons twelve (12) consecutive month period, total; and
- (b) The potential to emit of an individual HAP shall be limited to less than ten (10) tons per twelve (12) consecutive month period and a combination of HAPs shall be limited

to less than twenty-five (25) tons per twelve (12) consecutive, total.

- (c) Therefore, the requirements of 326 IAC 2-4.1-1, 326 IAC 8-1-6, 326 IAC 2-2 and 40 CFR 52.21 do not apply.

**D.1.3 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7-10.5(d)(5)(E)]**

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- (a) The total solids delivered to the applicators at the two (2) spray paint booths (P-3C and P-4C) shall not exceed 42.8 tons per twelve (12) consecutive month period.
- (b) Based on a minimum sixty-five percent (65%) transfer efficiency, this total solids throughput limit is equivalent to a potential to emit PM<sub>10</sub> (since PM is equal to PM<sub>10</sub>) before controls from the two (2) spray booths (P-3C and P-4C) of less than fifteen (15) tons per year.
- (c) Compliance with this throughput limit and a minimum sixty-five percent (65%) transfer efficiency renders the requirements of 326 IAC 2-7-10.5(f), 326 IAC 2-2 and 40 CFR 52.21 not applicable.

**D.1.2 4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.3 5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)**

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Compliance with the VOC and HAP usage limitations contained in Condition D.1.2 and shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.7 VOC and HAPs Emissions**

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Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage for the twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.4 8 Particulate Matter (PM)**

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The dry filters for PM control shall be in operation at all times when spray coating is in operation.

**D.1.5 9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks EP-2A, EP-2H, EP-3A, EP-3B, EP-4A, and EP-4B, EP-3C and EP-4C while one or more of the booths are in operation. The Compliance

Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **D.1.6 10 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.2, **D.1.3** and D.1.5 **9**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) **To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC, HAPs, and PM<sub>10</sub> emission limits established in Conditions D.1.2 and D.1.3.**
  - (1) **The amount as well as the VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
  - (2) **A log of the dates of use;**
  - (3) **The total VOCs, HAPs and PM<sub>10</sub> emitted for each month; and**
  - (4) **The weight of the VOCs, HAPs and PM<sub>10</sub> emitted for each compliance period.**
- (b)(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

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**A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

**Facility Description [326 IAC 2-7-5(15)] Specialty Plant**

(e) (g) One (1) paint spray booth, known as Speciality Plant, equipped with air atomization or equivalent spray applicators and dry filters for overspray control, exhausting through stack 1, capacity: 4 burial caskets per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

**Source Name:** York Casket Company - Indiana  
**Source Address:** US 27 and County Road 1050 South, Lynn, Indiana 47355  
**Mailing Address:** 2125 E. County Road 1050 South, Lynn, Indiana 47355  
**Part 70 Permit No.:** T 135-7198-00009  
**Facilities:** Spray Booths P-3C and P-4C.  
**Parameter:** VOC Delivered to the Applicators  
**Limit:** Less than twenty five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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Source Modification: 135-15524-00009  
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**Phone:** \_\_\_\_\_

**Attach a signed certification to complete this report.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

**Source Name:** York Casket Company - Indiana  
**Source Address:** US 27 and County Road 1050 South, Lynn, Indiana 47355  
**Mailing Address:** 2125 E. County Road 1050 South, Lynn, Indiana 47355  
**Part 70 Permit No.:** T 135-7198-00009  
**Facilities:** Spray Booths P-3C and P-4C.  
**Parameter:** Single HAP Delivered to the Applicators  
**Limit:** Less than ten (10) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

**Source Name:** York Casket Company - Indiana  
**Source Address:** US 27 and County Road 1050 South, Lynn, Indiana 47355  
**Mailing Address:** 2125 E. County Road 1050 South, Lynn, Indiana 47355  
**Part 70 Permit No.:** T 135-7198-00009  
**Facilities:** Spray Booths P-3C and P-4C.  
**Parameter:** Combination of HAPS Delivered to the Applicators  
**Limit:** Less than twenty-five (25) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Combination HAPs (tons)	Combination HAPs (tons)	Combination HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

**Source Name:** York Casket Company - Indiana  
**Source Address:** US 27 and County Road 1050 South, Lynn, Indiana 47355  
**Mailing Address:** 2125 E. County Road 1050 South, Lynn, Indiana 47355  
**Part 70 Permit No.:** T 135-7198-00009  
**Facilities:** Spray Booths P-3C and P-4C  
**Parameter:** Coating Solids  
**Limit:** The total solids delivered to the applicators shall not exceed 42.8 tons per twelve (12) consecutive month period, total. This throughput limit is equivalent to PM<sub>10</sub> emissions of less than fifteen (15) tons per twelve (12) consecutive month period, total

YEAR: \_\_\_\_\_

Month	Total Solids Delivered (tons)	Total Solids Delivered (tons)	Total Solids Delivered (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Attach a signed certification to complete this report.**

**Conclusion**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 135-15524-00009 and Minor Permit Modification No. 135-15568-00009.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: York Casket Company  
Address City IN Zip: U.S. 27 and County Road 1050 South, Lynn, Indiana 47355  
MSM: 135-15524  
Plt ID: 135-00009  
Reviewer: Michael S. Schaffer  
Date: April 17, 2002**

Material	Density (lbs/gal)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (lbs/unit)	Particulate Potential (lbs/hr)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Low HAPs Topcoat	8.08	0.21000	14.000	4.58	13.47	323.16	58.98	0.26	3.64	15.94	N/A	65%
Composite Color coat	7.96	0.24600	14.000	5.10	17.56	421.55	76.93	0.25	3.50	15.33	N/A	65%

	PM	Control Efficiency	95.00%									
<b>State Potential Emissions</b>		<b>Uncontrolled</b>		<b>31.03</b>	<b>744.71</b>	<b>135.91</b>				<b>31.27</b>		
<b>Add worst case coating to all solvents</b>		<b>Controlled</b>		<b>31.03</b>	<b>744.71</b>	<b>135.91</b>				<b>1.56</b>		

METHODOLOGY

**Note\* Source will be taking a limit on VOC to less than 25 tons per year and total solid throughput shall be no more than 42.8 tons per year to ensure PM-10 Emissions are less than 15 tons per year.**

Pounds of VOC per Gallon Coating was given to us by the applicant

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: York Casket Company  
Address City IN Zip: U.S. 27 and County Road 1050 South, Lynn, Indiana 47355  
MSM: 135-15524  
Plt ID: 135-00009  
Reviewer: Michael S. Schaffer  
Date: April 17, 2002**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
						Benzene					
Low HAPs Topcoat	8.08	0.21000	14.000	0.00%	0.00%	0.00%	18.00%	0.00	0.00	0.00	18.73
Composite Color Coat	7.96	0.24600	14.000	17.10%	0.20%	3.50%	0.00%	20.53	0.240	4.20	0.00
<b>Individual Total</b>								<b>20.5</b>	<b>0.240</b>	<b>4.20</b>	<b>18.73</b>
<b>METHODOLOGY</b>								<b>Overall Total</b>	<b>43.7</b>		

**NOTE\*** This source shall limit total HAPs to 8.04 tons per year in conjunction with the twenty-five (25) ton per year VOC limit.

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs